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Attorneys for Plaintiffs Hui MA, Ailing ZHAO, Xi LIU, Yixuan WANG, and Rui ZHANG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HUI MA, AILING ZHAO, XI LIU,
YIXUAN WANG, and RUI ZHANG,

Plaintiffs,

v.

GOLDEN STATE RENAISSANCE
VENTURES, LLC, *dba* Golden Gate
Global, a California Limited Liability
Company; GSRV MANAGEMENT, LLC, a
California Limited Liability Company;
GSRV-VTI MANAGEMENT, LLC, a
California Limited Liability Company;
ERIC CHELINI, an individual; STEVEN
KAY, an individual; and VERTEBRAL
TECHNOLOGIES, INC., a Minnesota
corporation,

Defendants.

Case No. 3:21-cv-00856-WHO

**STIPULATION AND [PROPOSED]
ORDER GRANTING PLAINTIFFS
LEAVE TO FILE OMNIBUS RESPONSE
BRIEF IN EXCESS OF PAGE LIMIT
PURSUANT TO L.R.7-4(B)**

Complaint filed: Feb. 3, 2021

Date: May 26, 2021
Time: 2 p.m.
Courtroom: Courtroom 2, 17th fl.
Judge: Hon. William H. Orrick

Pursuant to LR. 7-4(b), Plaintiffs Hui MA, Ailing ZHAO, Xi LIU, Yixuan WANG, and Rui ZHANG (“Plaintiffs”), by and through undersigned counsel, respectfully request leave to file a single omnibus response to the two Motions to Compel Arbitration and one Joinder, filed respectively by each of Defendants in this matter (Doc. 42, 44 and 45) (together, the “Motions”). In an effort to avoid duplication, Plaintiffs seek leave to file an omnibus response that exceeds the page limit for a single response brief. Plaintiffs seek leave to file a single omnibus response no longer than 50 pages, which is the total combined page limit for two separate responses briefs pursuant to the page limits set forth in L.R. 7-4. Under the otherwise applicable rules, Plaintiffs would be entitled to file response briefs in opposition to the two Motions and one Joinder. In lieu of three separate filings, Plaintiffs seek leave to file a single omnibus response that is longer than 25 pages.

Pursuant to the parties’ prior stipulation and order, Plaintiffs’ response to the Motions is due on or before May 5, 2021. (Doc. 40.) Plaintiffs therefore file this stipulation before the deadline. *See* L.R. 7-4(b).

Counsel for Plaintiffs has conferred with counsel for all Defendants on this request. Counsel for Defendants consent to this request and they join this stipulation.

DATED: May 4, 2021

By: DGW KRAMER LLP

/s/ Katherine Burghardt Kramer

Rongping Wu
Katherine Burghardt Kramer
Olivia M. Goetsch

*Counsel for Plaintiffs Hui MA,
Ailing ZHAO, Xi LIU, Yixuan
WANG, and Rui ZHANG*

1 DATED: May 4, 2021

BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation

3 By: /s/ Robert H. Bunzel

4 Robert H. Bunzel
5 Attorneys for Defendants GOLDEN STATE
6 RENAISSANCE VENTURES, LLC; GSRV
MANAGEMENT, LLC; and STEVEN KAY

8 DATED: May 4, 2021

HANSON BRIDGETT LLP

10 By: /s/ Lawrence M. Cirelli

11 Lawrence M. Cirelli
12 Attorneys for Defendants ERIC CHELINI and
GSRV-VTI MANAGEMENT, LLC

13 DATED: May 4, 2021

SEYFARTH SHAW LLP

15 By: /s/ M. Ryan Pinkston

16 M. Ryan Pinkston
17 Alexandra V. Drury
Attorneys for Defendant VERTEBRAL
TECHNOLOGIES, INC.

19
20 **ATTESTATION REGARDING SIGNATURES**

21 Pursuant to Civil Local Rule 5-(i) regarding signatures, I attest that the concurrence in the
22 filing of this document has been obtained.

23
24 DATED: May 4, 2021

By: DGW KRAMER LLP

25 /s/ Katherine Burghardt Kramer
26 Katherine Burghardt Kramer

ORDER

IT IS HEREBY ORDERED THAT:

1. Plaintiffs may file a single omnibus response brief of up to 50 pages in response to the Motions as defined above.

DATED: May __, 2021

Hon. William H. Orrick
U.S. District Judge
Northern District of California